

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

<hr/>		X
CITY OF TAYLOR GENERAL	:	Civil Action No. 1:07-cv-10279-GBD
EMPLOYEES RETIREMENT SYSTEM, On	:	
Behalf of Itself and All Others Similarly	:	<u>CLASS ACTION</u>
Situated,	:	
	:	
Plaintiff,	:	
	:	
vs.	:	
	:	
SANOFI-AVENTIS, et al.,	:	
	:	
Defendants.	:	
	:	
<hr/>		
CARRIE SMITH, Individually and On Behalf	:	Civil Action No. 1:08-cv-00021-UA
of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
	:	
vs.	:	
	:	
SANOFI-AVENTIS, et al.,	:	
	:	
Defendants.	:	
<hr/>		
	X	

THE CITY OF EDINBURGH COUNCIL ON BEHALF OF THE LOTHIAN PENSION FUND  
AND NEW ENGLAND CARPENTERS GUARANTEED ANNUITY FUND'S MOTION FOR  
APPOINTMENT AS LEAD PLAINTIFF, APPROVAL OF THEIR SELECTION OF LEAD  
COUNSEL AND CONSOLIDATION OF RELATED ACTIONS

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that putative class members the City of Edinburgh Council on Behalf of the Lothian Pension Fund and New England Carpenters Guaranteed Annuity Fund (the "Global Funds") will and hereby do move this Court on a date and at such time as may be designated by the Court, at 500 Pearl Street, New York, NY 10007, for an order: (1) appointing the Global Funds as lead plaintiff pursuant to §21D(a)(3)(B) of the Securities Exchange Act of 1934, as amended by the Private Securities Litigation Reform Act of 1995; (2) approving the Global Funds' selection of Coughlin Stoia Geller Rudman & Robbins LLP to serve as lead counsel; and (3) consolidating the above-captioned actions. In support of this motion, the Global Funds submit the accompanying memorandum of law and the Affidavit of David A. Rosenfeld.

DATED: January 14, 2008

COUGHLIN STOIA GELLER  
RUDMAN & ROBBINS LLP  
SAMUEL H. RUDMAN  
DAVID A. ROSENFELD

---

s/ David A. Rosenfeld  
DAVID A. ROSENFELD

58 South Service Road, Suite 200  
Melville, NY 11747  
Telephone: 631/367-7100  
631/367-1173 (fax)

COUGHLIN STOIA GELLER  
RUDMAN & ROBBINS LLP  
DARREN J. ROBBINS  
RAMZI ABADOU  
655 West Broadway, Suite 1900  
San Diego, CA 92101  
Telephone: 619/231-1058  
619/231-7423 (fax)1

[Proposed] Lead Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on January 14, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 14, 2008.

s/ David A. Rosenfeld

DAVID A. ROSENFELD

COUGHLIN STOIA GELLER

RUDMAN & ROBBINS LLP

58 South Service Road, Suite 200

Melville, NY 11747

Telephone: 631/367-7100

631/367-1173 (fax)

E-mail: [drosenfeld@csgrr.com](mailto:drosenfeld@csgrr.com)

## Mailing Information for a Case 1:07-cv-10279-GBD

### Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **David Avi Rosenfeld**  
drosenfeld@csgrr.com,e\_file\_ny@csgrr.com,amartin@csgrr.com

### Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)